



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

**REPLY TO ATTENTION OF:** 

5HW-TUB

NOV 2 9 1982

Mr. James Reid Field Operations Section Division of Land Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706 RECEIVED

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E.P.A. — D.L.P.C. STATE OF ILLINOIS

STATE OF ILLINOIS

Re: ILD 001833714

Change of Ownership

Dear Mr. Reid:

In their letter of June 22, 1982, PVS Chemicals, Inc., notified U.S. Environmental Protection Agency (U.S. EPA) that they had purchased the Allied Chemical Corporation Calumet Works, Chicago, Illinois. Along with their letter PVS Chemicals, Inc., submitted a Notification of Hazardous Waste Activity in which the company identifies their hazardous waste activity solely as a generator of hazardous waste, and not a treatment and storage facility.

Subsequent investigation of our files and communication with PVS Chemical, Inc., revealed that:

- (1) The facility had interim status as a generator and a treatment and storage facility when it was owned by Allied Chemical Corporation.
- (2) The facility has not gone through closure as delineated in 40 CFR Part 265.
- (3) PVS Chemicals, Inc., has not submitted a revised Part A Permit Application as required in 40 CFR §122.23 for changes in interim status.
- (4) PVS Chemicals, Inc., is generating the identical wastes identified in the Allied Chemical Corporation Notification of Hazardous Waste Activity.

Enclosed are copies of our correspondence with PVS Chemicals, Inc.

EPA Region 5 Records Ctr.

28854

The above findings suggest that the site may still qualify as a treatment and storage facility. Therefore, U.S. EPA requests that Illinois Environmental Protection Agency (IEPA) inspect the facility to determine its compliance with the requirements under RCRA. We also request IEPA's recommendation as to what actions, if any, should be taken against both PVS Chemicals, Inc., and Allied Chemical Company.

Please respond to Mr. Gale Hruska of my staff, at (312) 886-6138, with the inspection results and your recommendations.

Sincerely yours,

William H. Miner, Chief

Technical, Permits, and Compliance Section

Enclosures



#### VS CHEMICALS, INC. (ILLINOIS)

SUBSIDIARY OF PRESSURE VESSEL SERVICE, INC. 12260 South Carondolet Avenue • Chicago, Illinois 60633 Phone 312-933-8800

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WASTE MANAGEMENT BRANCH EPA, REGION

June 22, 1982

Y. J. Kim EPA REGION V RCRA ACTIVITIES P 0 BOX 7861 CH1CAGO IL 60680

Gentlemen:

Attached is our completed EPA Form 8700-12(6-80) entitled NOTIFICATION OF HAZARDOUS WASTE FACILITY.

We apologize for the delay in submitting this form. However, ILD 601833714 we were under the impression at the time of our purchase of the Allied Chemical Corporation plant at 12260 S. Carondolet Ave., Chicago IL 60633, in October, 1981, that notification of such sale in correspondence to RCRA at that time, also automatically transferred the Federal ID number to PVS Chemicals, Inc. (Illinois).

> We wish now to establish our own Federal 10 number, and when that is accomplished, file an Amended Part A.

If there appear to be any complications or if additional information is required, please contact us immediately.

Thank you for your assistance in our request.

Very truly yours,

PVS CHEMICALS, INC. (ILLINOIS)

R. D. Herzberger

Plant Manager

RDH:er Encl.

cc: Mr. Broslin - EPA - Region V A. Schlumberger - Detroit

.FA	NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinted						
NSTALLA- TION'S EPA I.D. NO.		label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information						
I. STALLATION		in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted						
INSTALLA- TION II. MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE	label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer						
LOCATION III OF INSTAL- LATION	4 G 23 W	to the INSTRUCTIONS FOR FILING NOTIFI- CATION—before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).						
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INSTALLATION'S EPA LD. NUMBER APPROVED OATE RECEIVED (yr., mo., & day)  F ILD 980793079								
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CITY OR TOWN  ST. ZIP CODE  L L G O G S 3								
IV. INSTALLAT	TION CONTACT							
2 H E R Z B	NAME AND TITLE (last, first, & job title)  ERGER, R.D.PLANT-MANAGE	PHONE NO. (area code & no.)  R 3 1 2 9 3 3 8 8 0 0						
V. OWNERSHIP								
5 P V S C	HEMICALS, INC. (ILLINOIS	)						
(enter the appropriate letter into box)  VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))  A GENERATION  B. TYPE OF OWNERSHIP  ONLY  B. TRANSPORTATION (complete item VII)  ST  ST  ST  C. TREAT/STORE/DISPOSE  D. UNDERGROUND INJECTION  ST  ST  ST  ST  ST  ST  ST  ST  ST  S								
VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))								
A. AIR	B. RAIL	R (specify):						
VIII. FIRST OR SUBSEQUENT NOTIFICATION  Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification.								
If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.								
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.													
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RECORD OF COMMUNICATION	PHONE CALL DISCUSSION FIELD	TRIP CONFERENCE					
	(Record of item checked above)						
TO: .	FROM: 7 B MARCH 2705)	6-16-82					
D. Hertzburger (933-8800)	J. Brossman (886-3785)	2:15 pm					
PVS Chemical - No ID NoForm	3 nerly Allied Chemical -ID 00183714						

SUMMARY OF COMMUNICATION

I contacted Mr. Hertzburger to determine why PVS failed to submit an amended part A when they acquired the Allied Chemical Plant located at 12260 Carondolet Ave. in Chicago. Currently, PVS is operating without an EPA I.D. No.

When Allied Chemical owned this facility they operated a surface impoundment to manage hazardous waste. Mr. Hertz indicated that the surface impoundment is not presently used to manage hazardous waste; therefore, PVS has not complied with the groundwater regulations. I informed Mr. Hertzburger that the RCRA regulations require PVS to monitor the groundwater until the surface impoudment is closed in accordance with the hazardous waste regulations.

#### CONCLUSIONS, ACTION TAKEN OR REQUIRED

Based upon my phone conversation with Mr. Hertzburger, it appears that there may be a number of past and current RCRA violations at this facility. I recommend that an ISS inspection be performed ASAP to determine if this facility is in compliance. I also suggest that Allied Chemical be contacted to determine what they did to comply with the groundwater monitoring regulations between Nov. 19, 1981, and the date ownership of this facility was transferred to PVS Chemical.

INFORMATION COPIES

TO:

Bob Stone, Art Kawatachi, Horst Witschonke, Bill Miner

## PVS CHEMICALS, INC. (ILLINOIS)

SUBSIDIARY OF PRESSURE VESSEL SERVICE, INC.

12260 South Carondolet Avenue • Chicago, Illinois 60633

Phone 312–933-8800

July 16, 1982

Mr. Karl J. Klepitsch, Jr., Chief Waste Management Branch U. S. Environmental Protection Agency Region V 111 West Jackson Boulevard Chicago IL 60604

Dear Mr. Klepitsch:

I have had considerable recent discussion with members of your staff regarding the RCRA status of this plant. I would like to take this opportunity to explain the background information regarding RCRA, and seek your advice regarding further action.

The Calumet plant was owned by Allied Chemical Corporation until October 13, 1981, when it was sold to PVS Chemicals, Inc. (Illinois). As required by RCRA, Allied submitted Form 3010, and later the RCRA application, Part A, on November 14, 1980. The primary RCRA facility at Calumet Works was a two-compartment surface impoundment. The surface impoundment was a hazardous facility pursuant to RCRA due to the pH of the water handled in the impoundments.

Prior to November, 1981, the plant performed process modifications which raised the pH of the material entering the impoundments to a level classified as non-hazardous pursuant to RCRA. The solid residue generated in the impoundments is non-hazardous pursuant to RCRA.

Based on the fact that the surface impoundments do not handle hazardous waste, it is my understanding that RCRA registration is unnecessary. I have filed documents apprising you of the transfer of ownership of Calumet Works from Allied to PVS, and have requested a RCRA ID number via a re-filed Form 3010 on June 22, 1982.

There still appears to be some misunderstanding regarding the exact RCRA status of this facility, and the forms and other paperwork which should be filed. Your guidance regarding how we should proceed in this matter would be greatly appreciated. Please call me at any time at 312-933-8800. I would be happy to meet with you at your office at your convenience if that would prove helpful.

Thank you.

Very truly yours,

PVS CHEMICALS, INC. (ILLINOIS)

R. D. Herzberger

Plant Manager

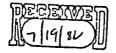
RDH:er

cc: A. Schlumberger - Detroit Office

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JUL 1 9 1982

WASTE MANAGEMENT BRANCH EPA REGION V.



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